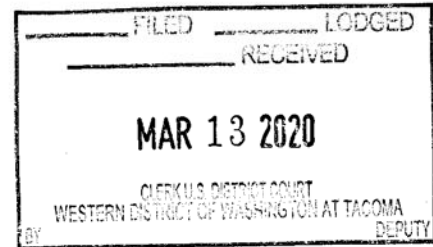


CERTIFIED TRUE COPY
ATTEST: WILLIAM M. MCCOOL
Clerk, U.S. District Court
Western District of Washington



By Travis Whitely
Deputy Clerk

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MATHIAS DOUGLAS KANE,

Defendant.

NO. 17J20-5054

COMPLAINT FOR VIOLATION
18 U.S.C. § 875(c)

BEFORE, Theresa L. Fricke, United States Magistrate Judge, Tacoma, Washington.

The undersigned complainant being duly sworn states:

COUNT 1

(Cyberstalking)

Beginning no later than on or about January 5, 2020, and continuing through on or about January 31, 2020, in the City of La Center, in the Western District of Washington and elsewhere, MATHIAS DOUGLAS KANE, with intent to injure, harass, and intimidate another person, identified herein as BS, used an interactive computer service, electronic communication service, electronic communication system of interstate commerce, and other facilities of interstate and foreign commerce, to engage in a course of conduct that placed BS in reasonable fear of death and serious bodily injury to BS, and

1 caused, attempted to cause, and would be reasonably expected to cause substantial
2 emotional distress to BS.

3 All in violation of Title 18, United States Code, Sections 2261A(2)(A) and (B).

4 **COUNT 2**
5 ***(Interstate Threats)***

6 On or about January 12, 2020, in the City of La Center, within the Western
7 District of Washington, and elsewhere, MATHIAS DOUGLAS KANE knowingly and
8 willfully transmitted in interstate and foreign commerce, from the State of Washington to
9 another state, communications, in the form of online internet posts, that contained threats
10 to injure BS.

11 All in violation of Title 18, United States Code, Section 875(c).

12 **COUNT 3**
13 ***(Interstate Threats)***

14 On or about January 20, 2020, in the City of La Center, within the Western
15 District of Washington, and elsewhere, MATHIAS DOUGLAS KANE knowingly and
16 willfully transmitted in interstate and foreign commerce, from the State of Washington to
17 another state, communications, in the form of online internet posts, that contained threats
18 to injure BS.

19 All in violation of Title 18, United States Code, Section 875(c).

20 This complaint is to be presented by reliable electronic means pursuant to Federal
21 Rules of Criminal Procedure 4.1 and 41(d)(3).

22 The undersigned complainant, Benjamin Long, being duly sworn, further deposes
23 and states as follows:

24 **INTRODUCTION**

25 1. I am a Special Agent ("SA") with the Federal Bureau of Investigation
26 ("FBI"), and have been so employed since 2012. I am currently assigned to the
27 Vancouver, Washington Resident Agency of the Seattle Division. While employed by
28 the FBI, I have investigated federal criminal violations related to high technology or

COMPLAINT/KANE - 2

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970

1 cybercrime, child exploitation, drug trafficking, counter-terrorism, and violent crimes
2 including cases involving threats of violence.

3 2. The facts set forth in this Affidavit are based on my own personal
4 knowledge; information obtained from other individuals during my participation in this
5 investigation, including other law enforcement officers; review of documents and records
6 related to this investigation; communications with others who have personal knowledge
7 of the events and circumstances described herein; and information gained through my
8 training and experience.

9 Because this Affidavit is submitted for the limited purpose of establishing
10 probable cause in support of a criminal complaint, it does not set forth each and every
11 fact that I, or others, have learned during the course of this investigation.

12 **SUMMARY OF PROBABLE CAUSE**

13 **A. Background Child Dependency and Custody Proceedings.**

14 3. Kane's criminal conduct alleged in this Complaint relates to ongoing
15 custody and dependency proceedings involving his 13-year-old daughter, RNK. I am
16 familiar with the circumstances of these proceedings by virtue of reviewing records of
17 Cowlitz County and the Washington State Department of Children Youth and Family
18 (including Child Protective Services) and related agencies, as well as by discussing these
19 matters with various participants in the proceedings, including social workers involved in
20 the proceedings.

21 4. According to records of the Cowlitz County courts, Kane has had full
22 custody of RNK since 2013. Kane lives in a house located at [REDACTED], La
23 Center, Washington, along with his girlfriend, two other children, and RNK (until she left
24 the residence, as described below).

25 5. In February 2019, Child Protective Services began investigating a report
26 that Kane's girlfriend physically abused RNK. Shortly thereafter, a no-contact order was
27 entered by a Clark County court, prohibiting contact between the girlfriend and RNK. As
28 a result, RNK began living with her mother and grandmother on a nearby property.

6. Due to a variety of circumstances, it became difficult for RNK to live with her mother. In or about June 2019, RNK's mother agreed that BS would take custody of RNK. BS was the mother of one of RNK's friends. BS lived nearby Kane's residence, and was an acquaintance of Kane's. RNK lived with BS until in or about December 2019, during which time she was enrolled in school along with BS's daughter. During this time, BS's sister, who is a medical professional, also assisted in taking care of RNK.

7. In January 2020, Washington State authorities initiated dependency proceedings related to RNK. Due to a variety of circumstances, it was no longer feasible for RNK to live with BS and/or her sister, and the State initiated proceedings to seek a court order for RNK to live in state housing. Kane actively resisted the State's request and formally contested the dependency proceedings. To date, the courts have ruled in favor of the State, with further proceedings scheduled for late March 2020.

B. Kane's Online Harassment and Threatening of BS.

8. The criminal activities alleged in this Complaint involve Kane's online cyberstalking and threatening of BS. The context of Kane's online statements makes clear that he was targeting BS for the role he perceived she played in RNK's custody/dependency proceedings, and because he perceived her as being Jewish. Many of Kane's posts also contain threats to kill and/or physically harm the CPS workers and law enforcement officers who are involved in the dependency proceedings, and to kill Jewish people in general.

9. Kane's relevant online statements were postings he made over the online platform known as Disqus. Disqus is a worldwide blog comment hosting service for web sites and online communities that uses a networked platform. Disqus allows users to post publically viewable comments associated with online videos, news articles, and the like.¹ Kane's postings on Disqus were made under the user name of "AshkeNAZI," with an

¹ I have interviewed employees of Disqus, who have informed me that their computer servers – located in Texas – house all of the relevant posts made by Kane over his AshkeNAZI account.

1 associated avatar depicting a white male wearing an overcoat spray-painting a swastika
2 on the wall of a building marked with a sign identifying it as a Jewish synagogue.

3 10. During a court hearing related to the above-referenced dependency
4 proceedings, Kane admitted that he is the user of the AshkeNAZI account. However,
5 Kane claimed that he never posted any threatening comments and that his account had
6 been "hacked." Kane's claim that his account was "hacked" is controverted by records
7 obtained from Disqus and Comcast, which confirm that the Disqus posts made over the
8 AshkeNAZI account resolve to an IP address that is subscribed to by Kane at his known
9 residential address of [REDACTED], La Center, Washington. Moreover, the content of
10 the posts over the AshkeNAZI account are consistent with Kane's personal frustrations
11 over the child dependency/custody proceedings involving his daughter, and are therefore
12 consistent with Kane being the author of the posts.

13 11. On January 6, 2020, Kane posted: "I speak my mind and have been
14 attacked over and over by every alphabet agency Washington State has from Law
15 Enforcement to Child and Family Services, its been non stop harassment. *I am to the*
16 *point i am going to do something nuts but i want to take as many of them with me as i*
17 *can!!!!*" (emphasis added)

18 12. On January 7, 2020, Kane posted: "I am a White Nationalist not a Cultural
19 Marxist or White Supremacist. HUGE difference! I dont feed the Jews what they need to
20 keep the White race suppressed like Hail Cuckery and the rest of this Zionist ran
21 alternative media conglomerate does. Thats all you Hasbara fools try to do is put words in
22 my mouth and discredit White Nationalism. Line up Hasbara see if you can make me
23 stop, *you fucked with my family, i will never go away, it will end in gunfire!*" (emphasis
24 added)

25 13. On January 9-10, 2020, Kane made a series of posts stating, among other
26 things: "You have 3 Hasbara agents working diligently to Harass your opinion. That's
27 how Zionist Jews work in the States. You have the right to say whatever you want but
28 you will be subtly attacked for what you say. Your family is at stake, trust me my 13 year

1 old daughter has been kidnapped by them. CPS IS a State ran Zionist tool used to attack
 2 the White family! if you are speaking about them on the internet, protect yourself. Go
 3 look at the comment this fucking bastard left for me today, literally throwing in my face
 4 they have my daughter!!!!!! *IM going to kill some people and its going to be a miserable*
 5 *death i bring them! . . . It's going end with dead social workers lawyers and judges*
 6 *maybe a cop or 2 one by one like a serial killer until one of your pigs gets me. . . . Yes i*
 7 *only kill Zionists, i have a nice place to put people like you, would you like to see it*
 8 *sometime? i would like to show you. . . . I know what's going on and have for a long*
 9 *time, i have names and addresses you just think i won't do anything."* (emphasis added)

10 14. On January 12, 2020, Kane posted: "[W]hat do we do when Zionist Jews
 11 take your child and cps, law enforcement will cover up a kidnapping and turn it into a
 12 child that ran away and now your stuck with a missing child knowing that these people
 13 have done something with her...*do you arm yourself and start picking em off until you get*
 14 *picked off? what do you do?"* (emphasis added)

15 15. On January 12, 2020, Kane posted on the website Bitchute a video entitled,
 16 "My Missing Child [RNK]." In this video, Kane claims that BS "kidnapped" his
 17 daughter. Kane also specifies that BS was Jewish and discusses the Jewish roots of her
 18 surname. Kane posted related comments under the video using his Disqus account. In
 19 one post, Kane publically doxxed BS by posting a screen shot of his phone showing BS's
 20 full name, cell and home phone numbers, and home address. In another post, Kane
 21 stated:

22 We dont talk to or cooperate with CPS or LEO if they call to angle on us
 23 we hang up on them. Yes [BS] gave [RNK] a phone, that's all she cared
 24 about! She was putty in her hands at that point they took her to school and
 25 with counselors took grainy b&w pics of 2 one inch bruises saying my GF
 26 did that to her with a dog leash! LIES! They charged her with felony child
 27 abuse we wanted to take it to trial they dragged it on for 8 months then
 28 dropped the charges now [RNK] is missing, everything they have done is
 based from fabricated lies. LEO CPS and especially this fucking cunt [BS]
 are all involved in KIDNAPPING my kid and trying to pass it off as she is
 a runaway! its all very illegal!!! *This will not end well for anybody, i am a*

1 *very patient man, but my patience is running out, i wont feel a thing when i*
 2 *finally see red. I have called the State Attorney Generals office and left my*
 3 *name and number if they dont call back Monday morning i will call them*
 4 *after noon if they dont help, i will handle this myself and it wont be pretty.*
 (emphasis added)

5 16. On January 20, 2020, Kane again doxxed BS by posting her home address
 6 and phone number, and made threats to kill BS and other individuals who were involved
 7 in the dependency proceedings:

8 They are deathly afraid of me i stare at them in court with the eyes of hell
 9 and they cant stand to look more than a few seconds before they look away.
 10 I do show full restraint they provoke and WANT ME TO REACT! that's
 11 the only way they can win is if i do! I am smarter than that now i will sue
 12 them and do what i have to do to make them put that AshkeNAZI Jewess
 13 cunt [BS] in a cell. *Her address is [REDACTED] Her phone number is*
 14 *[REDACTED] everybody trash this Jew cunt! she is getting a copy of this*
in the mail tuesday! . . . I normally wouldn't agree with that statement but
with what they have done to my daughter i am ready to kill now and ask
questions later. (emphasis added)

15 17. During January 2020, Kane made several additional posts concerning BS
 16 and other individuals involved in the dependency proceedings. Some examples of these
 17 posts are:

- 18 • "I need a good attorney from the Right CPS and a fucking Jew cunt
 19 have my 13yo kid illegally they have her on Prozac and another
 20 antipsychotic strapping her chest . . . I have money just want someone I
 21 can trust, all the attorneys in SW Washington are owned by the
 JUUUUUUUUdicial system. I need help, anybody?"
- 22 • "Not more than a month ago . . . a Jewish cunt that lives down the
 23 block from me targeted my 13 yo daughter. CPS Law enforcement the
 24 state of Washington they are all involved in trying to take my daughter .
 25 . . the Jew cunt's name is [BS], go type into google [BS] Jewish and
 26 read. . . It all started when that [BS] bitch took my kid to school and
 27 claimed bruises on her leg were from a spanking my GF did, all lies!!!
 28 They have nothing on me at all but wont let me see my kid. I am
 warning you all if you have children to watch them because these

1 fucking Jews know we are on here talking about them and they are
2 looking for ways to fuck with us!"

- 3 • "A NAZI Jew cunt that lives down the block targeted by 12 yo problem
4 child. . . . this witch . . . took my kid to school and said some bruises
5 on her leg were from a spanking my GF gave her which was all lies, so
6 the JEWdicial system filed felony charges against my GF and a
7 protection order is in place keeping my GF away from my daughter to
8 her grandmothers so we could fight this thing in court and get
9 everything straightened out, while my daughter was at her grandmothers
10 this cunt that lives down the road [BS] went a county away and took my
11 child from her grandmothers and never told me . . . Listen tell
12 everybody you can watch out for their kids!!! CPS and JEWS are going
13 after them!!!"
- 14 • "[I]t just so happens that a AshkeNAZI Jew cunt witch has gone after
15 my kid . . . This IS a direct attack for things I say on the web! Nobody
16 could in any way change my mind about that FACT! CPS is all Jews
17 and Gays or Gay Jews or groups like Wise team full of Tranny Jews . . .
18 Living in a residential neighborhood in America isn't safe unless you
19 know for sure its an all White neighborhood i didn't even check my
20 neighbors last names until a couple weeks ago and found out I have 5
21 AshkcNAZI Jewish families living in my neighborhood. I didn't even
22 know the [BS] name was AshkeNAZI until I looked it up."
- 23 • "I am in a quandary about the Jew myself I have a Nazi Jew that lives
24 down the street that teamed up with CPS and LEO to attack my family
25 through my daughter."
- 26 • "I have a Nazi Jew Cunt that lives down the street from me named [BS]
27 CPS LEO and the State of Washington all fucking with me. Something
28 my GF and i noticed in Family court was, ITS ALL FUCKING WHITE
29 PEOPLE that are being attacked by the system and the court room was
30 full! No other races were present the 4 days we spent in that courtroom!
31 except for the 80% Gay Bull Dike Jews that are State Employee's!"

18. During January 2020, Kane made numerous other posts containing threats
to kill Jews in general, sometimes also referring to his frustrations with BS and the
dependency proceedings. Some examples of these posts are:

- 1 • "Fuck all Abrahamic dick cutting cults! KILL THEM ALL!"
- 2
- 3 • "I have been bitching and fighting with everybody about who is the guilty
- 4 and who is an innocent Jew, after what was done to my family i am done.
- 5 THEY ALL NEED TO GO THE FUCK TO ISRAEL THEN WE NEED
- 6 TO TURN THAT LITTER BOX INTO GLASS!!! NOT ONE JEW LIVES
- 7 KILL THEM ALL!!! KAWABUNGA MOTHER FUCKERS!"
- 8
- 9 • "Lots of Zionist pigs in all our Nations! KILL THEM ALL! . . . Lets kill
- 10 every last motherfucking one of them!"

11 19. During January 2020, Kane also made multiple posts containing threats to
12 law enforcement officers, including the following posts:

- 13 • Kane posted a video depicting police activity with the title, "See if You Can
14 Count the 'Good Cops.'" Under the video, Kane wrote: "Some people
15 should make an example out of one of them and let the rest sweat, the one
16 with the Tazer, string him up after he is skinned, cut off his nuts (most
17 likely nutless) and stuff them in his mouth. You will see a change in tone
18 of the police if they started finding cops like that."
- 19 • Similarly, Kane commented about police officers: "Skinned with their own
20 nuts hanging from their mouth and hung from a light post! Metallica said it
21 best, Kill 'em all!"

22 20. On January 25, 2020, BS contacted local law enforcement officers
23 regarding Kane's online postings. BS stated that Kane's posts made her fearful for her
24 personal safety and that of her immediate family. BS specifically stated that Kane's posts
25 made her feel "terrified" and that Kane was "crazy and unpredictable." She further stated
26 that Kane owns "guns and ammo" and wants to "take everyone out one at a time." BS
27 also reported that on January 19, 2020, Kane and his girlfriend drove by BS's home very
28 slowly and looked at BS and her family and laughed.

29 21. In response to Kane's posts, on January 27, 2020, BS and her sister
30 petitioned for and obtained emergency protection orders in Clark County court against
31 Kane and his girlfriend. On February 7, 2020, the court issued permanent protection
32 orders, extending the terms of the protection orders for a period of one year.

C. Information About Kane's Possession of Firearms and Ammunition.

22. There is substantial information and evidence indicating that Kane possesses firearms and/or ammunition in his residence and/or vehicles. In several of Kane's Disqus posts during January 2020, Kane made comments specifically indicating he possesses firearms and ammunition, including the following examples:

- In one post, Kane suggested that he was manufacturing "ghost guns," which I know to be homemade, non-serialized firearms. Specifically, Kane wrote: "How are the police going to save you from a man breaking into your home with a gun? They wont show up until you and your family are dead and all your shit is gone fuck them start buying and building ghost guns! It's a fun hobby and if you get good enough at it you can make them for other people and get paid for something fun too do."
- "Most American Red Neck Gun Loving Patriots like me own a full size 4x4 truck, who needs roads."
- "Do you know how many after market gun part company's are in the United States? We have the most! and like me tons and tons of hobbyists."
- "if I smoke before going to the range i am on point and don't miss!"
- "[I] have been making my own ammo for over a decade . . . lol maybe you Hasbara cucks didn't know how deeply rooted guns are in American culture does that scare you? you didn't think we are like the UK a bunch of lady boys handing over their guns like the cunts they are! It will never happen here!" Along with this post, Kane posted what appears to be a link to a video entitled, "Ultimate HOW to Reload Your Own Ammunition."
- "A 6 shot cap and ball pistol? wtf i make all kinds of ammo but that's a pathetic joke. . . It's a hobby, like fishing something i enjoy doing."
- "I know a thing or 2 about ammo, i load my own. I would expect gun owners of this channel to have an understanding. . . . I have loaded extra powder filled blanks for the loud bang and HUGE Muzzle flash for the 4th last year."

1 23. Kane is a convicted felon who is prohibited from possessing firearms and
2 ammunition. Based on my review of court documents and follow-up investigation, I am
3 aware that Kane has been convicted of the following three felony offenses:

4 *Criminal Mischief in the First Degree (Damage Property)*, on or about
5 September 15, 1998, in the Multnomah County Circuit Court, in case
6 number 98-0433431.

7 *Manufacture of a Controlled Substance (Marijuana) and Possession of a*
8 *Controlled Substance (Marijuana)*, on or about December 27, 1999, in the
Columbia City Circuit Court, in case number 98-1318.

9 24. As noted above, BS and her sister obtained protection orders against Kane.
10 As part of the protection orders issued by the Clark County court, Kane was required to
11 surrender any firearms upon being served with the protection orders. Local law
12 enforcement officers went to serve the orders on Kane at his residence in La Center on
13 January 27, 2020. Kane refused to open the door to his house and would only speak to
14 the officers through a window. Kane refused to accept service of the orders from the
15 officer, instead instructing the officer to leave the papers in the door. Kane subsequently
16 called 911 and spoke to the police officer, claiming not to have any firearms to surrender.

17 25. On January 30, 2020, Kane went to the La Center Police Department to file
18 a complaint against an officer whom he perceived was obstructing his ability to gain
19 custody of his daughter, RNK. While at the police station, an officer served Kane with a
20 Notice to Surrender Firearms Order, stemming from the above-referenced protection
21 orders. Kane again denied possessing any firearms.

22 //

23 //

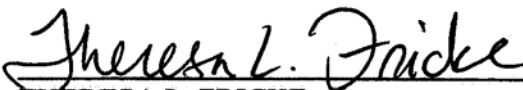
24 //

CONCLUSION

26. Based on the foregoing, I respectfully submit that there is probable cause to believe that Kane committed the above-referenced offenses.


BENJAMIN LONG
Special Agent, FBI

The above agent provided a sworn statement attesting to the truth of the contents of the foregoing affidavit by telephone on this 13th day of March, 2020. Based on the Complaint and the sworn statement, the Court hereby finds that there is probable cause to believe the Defendant committed the offenses set forth in the Complaint.


THERESA L. FRICKE
United States Magistrate Judge